

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:

SOVRANO, LLC,	§	CASE NO. 19-40067-11
MR. GATTI'S, LP,	§	CASE NO. 19-40069-11
GATTI'S GREAT PIZZA, INC.,	§	CASE NO. 19-40070-11
GIGI'S CUPCAKES, LLC,	§	CASE NO. 19-40072-11
GIGI'S OPERATING, LLC,	§	CASE NO. 19-40073-11
GIGI'S OPERATING II, LLC, <sup>1</sup>	§	CASE NO. 19-40074-11
Debtors.	§	<b>(Joint Administration Requested) Emergency Hearing on January 9, 2019 at 2:30 p.m.</b>

**DEBTORS' WITNESS AND EXHIBIT LIST  
FOR "FIRST DAY" MOTIONS**

The above-referenced debtors and debtors-in-possession (collectively, the “Debtors”) submit the following Witness List and Exhibit List in connection with the hearing currently scheduled for January 7, 2019 at 2:30 p.m. (the “Hearing”), before the Honorable Edward L. Morris, to consider the following “First Day” Motions:

1. Notice of Designation of Complex Chapter 11 Bankruptcy Cases;
2. Joint Emergency Motion for Order Directing Joint Administration of Chapter 11 Cases;
3. Joint Emergency Motion to Extend Time to File Schedules of Assets and Statements of Financial Affairs;
4. Joint Emergency Motion to Limit Notice;
5. Joint Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Use Cash Collateral of Equity Bank, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Setting a Final Hearing;

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sovrano, LLC (1470); Mr. Gatti's, LP (0879); Gatti's Great Pizza, Inc. (6061); Gigi's Cupcakes, LLC (8356); Gigi's Operating, LLC (0621); and Gigi's Operating II, LLC (8396).

6. Joint Emergency Motion for Order (I) Authorizing Debtors to (A) Maintain the Cash Management System, (B) Continue Using Existing Checks and Business Forms, and (C) Continue Intercompany Arrangements and (II) Granting Related Relief;
7. Joint Emergency Motion for Order Authorizing Debtors to (I) Honor Certain Prepetition Obligations to Customers, (II) Honor Prepetition Marketing Program with Franchisees, (III) Continue Certain Customer and Franchisee Programs and Practices, and (IV) Granting Related Relief; and
8. Joint Emergency Motion for Order Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits, and Other Compensation, (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations.

### WITNESSES

Debtors designate the following persons who may be called as witnesses to testify at the

Hearing:

1. Dawn M. Ragan, Chief Restructuring Officer;
2. Kyle C. Mann;
3. Any other witness called or designated by any other party for the Hearing; and
4. Any other rebuttal witnesses as necessary.

### EXHIBITS

In addition, the Debtors may use the following exhibits at the Hearing:

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>	<b>DISPOSITION</b>
1	Gatti's Proposed Budget [Docket No. 6, Ex. A]					
2	Gigi's Proposed Budget [Docket No. 6, Ex. B]					
	Gatti's and Gigi's Organization Chart (demonstrative)					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
	Any Exhibits Necessary to Rebut the Testimony of Witnesses Called or Designated by any Other Party.					

Respectfully submitted,

By: /s/ Michael A. McConnell  
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*Proposed Counsel for Debtors*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2019, a true and correct copy of the foregoing Witness and Exhibit list was served upon counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service and via e-mail to Lisa L. Lambert (Lisa.L.Lambert@usdoj.gov) and Erin Schmidt (Erin.Schmidt2@usdoj.gov).

/s/ Michael A. McConnell

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